

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY
30(B)(6) VIDEOTAPED DEPOSITION OF LARRY MOORE on 07/08/2015

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND
COMPOUNDING PHARMACY,
INC. PRODUCTS LIABILITY MDL No. 2419
LITIGATION
Master Dkt:
1:13-md-02419-RWZ

~~~~~  
THIS DOCUMENT RELATES  
TO:

All Actions

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30(b)(6) VIDEOTAPED DEPOSITION OF
LARRY MOORE

9:26 a.m.
July 8, 2015

305 East Spring Street
Cookeville, Tennessee

Blanche J. Dugas, RPR, CCR No. B-2290

EXHIBIT

2



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1 A. Uh-huh (affirmative).

2 Q. Did CMC also purchase the remaining medical
3 supplies -- or I should say the medical supplies that
4 were in the Specialty Surgery Center facility --

5 A. Yes.

6 Q. -- at the time of the asset purchase?

7 A. Yes. That's part of the inventory.

8 Q. Were -- at that time, were there any doses
9 of methylprednisolone acetate?

10 A. Not to my knowledge. All that stuff had
11 been returned.

12 Q. Okay. Not -- that was -- when you say all
13 that stuff, you mean the NECC compounded?

14 A. Correct.

15 Q. Do you know whether there were at that
16 time -- the time of the asset purchase whether there
17 were any doses of methylprednisolone acetate or MPA in
18 possession of Specialty Surgery Center that were made
19 by some entity other than NECC?

20 A. I do not know.

21 Q. Keep going back to Page 5 of Exhibit 460,
22 the assets purchased included the -- all patient
23 charts and records; is that right?

24 A. Yes, sir.

25 Q. Where -- what happened to the patient



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1 charts and records? Did they remain at the Specialty
2 Surgery Center facility?

3 A. No. They were transported to our medical
4 records department.

5 Q. Is that physically located at the Main
6 Street facility?

7 A. Yes, sir.

8 Q. Was -- were the records of patients of
9 Specialty Surgery Center kept segregated in any way
10 from other medical records stored at the Main Street
11 facility?

12 A. To my knowledge, they are.

13 Q. Do they still remain in a --

14 A. To my knowledge.

15 Q. Okay. Let me finish that question.

16 Do the records of Specialty Surgery Center
17 patients remain in a -- separated in some way from the
18 other records at the Main Street facility?

19 A. To my knowledge.

20 Q. Are they in a different room or just in a
21 different building?

22 A. I can't answer that.

23 Q. But somewhere, somehow, somebody can go in
24 and say, those right there are the Specialty Surgery
25 Center patients' records?



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1 Brown Avenue reads Cumberland Medical Center Specialty
2 Surgery Center Outpatient Endoscopy Services.

3 Q. That's what it currently reads?

4 A. That's what it reads.

5 Q. Okay.

6 A. The patients that receive services there
7 and are billed for those services, that statement
8 reads Cumberland Medical Center.

9 Q. And that name that's on the door, has that
10 been on the door continuously from the date of the
11 asset purchase or thereabouts through today?

12 A. No. It wasn't on the -- the building was
13 not open the next day.

14 Q. Okay. How long of a lag was there between
15 the asset purchase and the resumption of --

16 A. June the 27th through May the 23rd of 2014.

17 Q. What was that property used for during that
18 time period?

19 A. Nothing.

20 Q. Was there any -- any business activities at
21 all going on in that facility at that time?

22 A. No, sir.

23 Q. We're talking about the time after the
24 asset purchase through May of 2014.

25 A. No, sir.



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